

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

X

CAMPBELL,

Plaintiffs,

CIV. 05 2420

-against-

CONSOLIDATED EDISON COMPANY OF NEW YORK;
STEADMAN PARKING SERVICES, LLC; CONE-HIVES
PRODUCTIONS, LLC; and ALFRED STEADMAN

Defendants.

X

ANSWER
FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
★ JUN 15 2005 ★
BROOKLYN OFFICE

PLEASE TAKE NOTICE that the undersigned attorney hereby appears in this proceeding on behalf of the defendants STEADMAN PARKING SERVICES, LLC., CONE-HIVES PRODUCTIONS, LLC, and ALFRED STEADMAN, and demands that all papers be served upon the undersigned at the address hereinafter set forth.

PLEASE TAKE FURTHER NOTICE that the defendants,, answering the Plaintiff's Complaint herein, responds upon information and belief as follows:

1. Denies any knowledge or information sufficient to form a belief as to any of the allegations contained in paragraphs numbered "2" and "5" of the complaint.

2. Denies each and every allegation contained in the paragraphs of the Complaint numbered, "1", "3", "4", "6", "7", "8", "9", "10", "11", "12" and "13" inclusive, of the complaint and respectfully refers all questions of law to the Court for determination.

AS AND FOR A FIRST CLAIM FOR RELIEF

3. As to Paragraph "14" of the Complaint, Defendant repeats, reiterates and realleges each and every denial contained in the answer to the complaint as if fully set forth herein.

4. Denies each and every allegation contained in the paragraphs of the Complaint numbered, "15" through and including "19", inclusive, of the complaint and respectfully refers all questions of law to the Court for determination.

AS AND FOR A SECOND CLAIM FOR RELIEF

5. As to Paragraph "20" of the Complaint, Defendant repeats, reiterates and realleges each and every denial contained in the answer to the complaint as if fully set forth herein.

6. Denies each and every allegation contained in the paragraphs of the Complaint numbered, "21" through and including "23", inclusive, of the complaint and respectfully refers all questions of law to the Court for determination.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

7. Plaintiff's lawsuit is in retaliation for being arrested for threatening and attacking Defendant ALFRED STEADMAN with a knife, and for being terminated by Defendants as an employee for cause upon said altercation and continuing threats.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

8. Lack of personal jurisdiction.

AS AND FOR A THIRD AFFIRMATIVE DEFENSE

9. Defendant ALFRED STEADMAN is a managing member of Defendant STEADMAN PARKING SERVICES, LLC. Plaintiff fails to set forth any basis for personal liability of Defendant ALFRED STEADMAN.

WHEREFORE, this answering Defendants demands judgment dismissing the complaint in its entirety together with attorney's fees, costs and disbursements incurred

by the answering Defendants in this proceeding, and for such other and further relief as this Honorable Court deems just, proper and equitable.

Dated: Briarwood, New York
June 14 , 2005

Yours, etc.,



BRADLEY ZELENITZ, ESQ. (BMZ-4104)
GILDIN, ZELENITZ & SHAPIRO, P.C.
Attorneys for Defendants
STEADMAN PARKING SERVICES, LLC.
CONE-HIVES PRODUCTIONS, LLC.
ALFRED STEADMAN
138-44 Queens Boulevard
Briarwood, New York 11435
(718) 523-1111

AFFIRMATION OF SERVICE

State of New York }
County of Queens }ss:

BRADLEY M. ZELENITZ, ESQ., an attorney duly admitted to practice law before the Courts of the State of New York, hereby affirms the following under the penalties of perjury

I am not a party to this action, I am over 18 years of age and I reside at Kings County, New York.

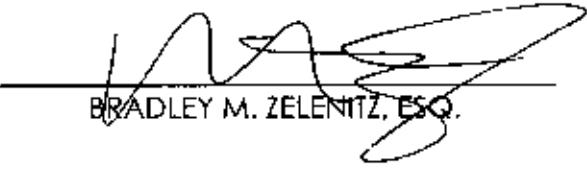
On June 14, 2005 I served a true copy of the annexed

ANSWER

by mailing the same in a sealed envelope with postage prepaid thereon, in an official depository of the USPS within the State of New York, addressed to the last known addressees as indicated below:

David Abrams
Attorney for Plaintiff Campbell
305 Broadway, Ninth Floor
New York, NY 10007

Consolidated Edison Company of New York
Defendant
4 Irving Place
New York, NY 10003



BRADLEY M. ZELENITZ, ESQ.

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Defendants.

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ANSWER

GILDIN, ZELENITZ & SHAPIRO, P.C.

BY: BRADLEY M. ZELENITZ, ESQ.

Attorneys for Defendants

STEADMAN PARKING SERVICES, LLC, CONE-HIVES PRODUCTIONS, LLC.

and ALFRED STEADMAN

138-44 Queens Boulevard, 2nd Fl.

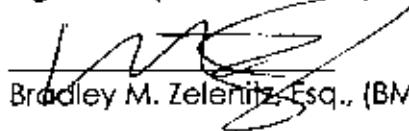
Briarwood, New York 11435

(718) 523-1111

Service of a copy of the within is hereby admitted:

Dated: June 14, 2005

Signature (Rule 130.1-1-a)



Bradley M. Zelenitz, Esq., (BMZ-4104)

PLEASE TAKE NOTICE:

 NOTICE OF ENTRY

That the within is a true copy of an _____ duly entered in the office of the clerk within named court on

 NOTICE OF SETTLEMENT

That an order _____ of which the within is a true copy will be presented for settlement to the HON. _____ one of the judges of the within named Court, at on _____ 2005 at ____ m
Dated:

Yours, etc.

GILDIN, ZELENITZ & SHAPIRO, P.C.